

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

HARRIS CLAIBORNE FRAZIER

CASE NO. 08-03051 EE

DEBTOR

MOTION TO LIFT THE AUTOMATIC STAY

COMES NOW Holly Dian Hughes Crawford, by counsel, and moves the Court to lift the automatic stay as follows:

1. Holly Dian Hughes Crawford and Harris Claiborne Frazier are the parents of a minor child, namely, Ella Dian Hughes, born February 7, 2004.

2. Holly Dian Hughes Crawford was awarded the primary physical custody of the aforesaid minor child by the Juvenile Court of Williamson County, Tennessee, In the Matter of: Ella Dian Hughes, date of birth 02/17/2004, A Child Under Eighteen (18) Years of Age, Social File No. 241361, Legal File No. 28150, Docket No. 61354 on March 5, 2009.

Additionally, the aforesaid Court required Harris Claiborne Frazier to pay the sum of \$106,800.00 as child support arrearage and for him to pay the monthly sum of \$2,000.00, beginning March 6, 2009. Attached hereto as Exhibit "A" is a true and correct copy of said Judgment.

3. The aforesaid Tennessee Judgment was duly entered and enrolled in the Chancery Court of Madison County, Mississippi. Attached hereto as Exhibit "B" is a true and correct copy of said enrollment.

4. Harris Claiborne Frazier has wholly failed to pay the child support arrearage, as well as the monthly child support, which began on March 6, 2009. Holly Dian Hughes Crawford is desirous of filing the appropriate pleadings, Petitions and Complaints with the

Chancery Court of Madison, Mississippi in order to get the appropriate relief against Harris Claiborne Frazier's failure to pay child support.

WHEREFORE, PREMISES CONSIDERED, Holly Dian Hughes Crawford moves the Court to grant relief from the automatic stay in order pursue child enforcement proceeding and Holly Dian Hughes Crawford further requests such other relief to which she may be entitled in the premises.

Respectfully submitted,

HOLLY DIAN HUGHES CRAWFORD

BY: ROBERT L. SPOTSWOOD

PREPARED BY:

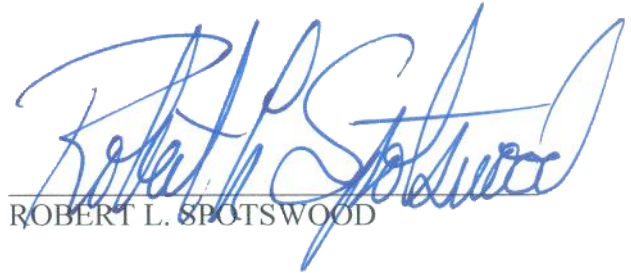
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Attorney for Holly Crawford

CERTIFICATE OF SERVICE

I, Robert L. Spotswood, attorney for Holly Dian Hughes Crawford, do hereby certify that I have this day caused to be served, via CM/ECF and/or United States Postal Service, a true and correct copy of the above and forgoing "Motion to Lift the Automatic Stay to:

DEREK HENDERSON
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R. MICHAEL BOLEN
Ust.pregion05.ab.ecf@usdoj.gov



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